

LAW OFFICES OF
WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER
A PROFESSIONAL CORPORATION

650 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CALIFORNIA 94108-2615
(415) 981-7210

**DOUGLAS S. SAELTZER (State Bar #173088)
ATTORNEYS FOR PLAINTIFFS**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CARLA CORTES, a minor, by and through her
Guardian ad Litem, ISABEL CORTES
GARCIA; ISABEL CORTES GARCIA; and
JUAN CARLOS GARCIA TORRES

Plaintiffs,

V.

DAIMLER CHRYSLER CORPORATION, and
DOES ONE through ONE HUNDRED,

Defendants.

Case No. 05-01012 JL

**STIPULATION AND [PROPOSED]
ORDER RE CONTINUATION OF NON-
EXPERT DISCOVERY DEADLINE**

19 The parties, by and through their attorneys of record, hereby submit the following
20 Stipulation to continue the deadline for non-expert discovery in the above-captioned matter from
21 August 11, 2006 to September 30, 2006.

REASON FOR REQUEST

23 Nonexpert discovery has taken longer than expected, and both parties have further
24 discovery to complete. Defendant wishes to schedule a medical exam of plaintiff Isabel Cortes
25 and has been coordinating with the schedule of plaintiff and the physician. Plaintiffs are still
26 waiting for responses to written discovery and are in the process of coordinating depositions of
27 Chrysler employees in Michigan. Both parties desire to complete the deposition of the emergency
28 response professionals who responded to the scene of this incident.

The parties stipulate and request that the Court continue the deadline for completion of non-expert discovery from August 11, 2006 to September 30, 2006.

PREVIOUS TIME MODIFICATIONS

The parties stipulated to, and the Court ordered, a continuation of the mediation deadline from December 16, 2005 to January 6, 2006. The parties stipulated to, and the court ordered, a continuation of the mediation deadline from January 6, 2006 to March 30, 2006.

EFFECT OF PROPOSED TIME MODIFICATION ON CASE SCHEDULE

The parties do not foresee negative effects on the case schedule resulting from this proposed deadline modification. The parties agree that, with a trial date of February 12, 2007, the three intervening months between the proposed non-expert discovery deadline and trial will be sufficient time to prepare the case for trial.

STIPULATION

The parties stipulate and request that the Court continue the deadline for non-expert discovery in the above-referenced matter from August 11, 2006 to September 30, 2006.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: July 18, 2006

SEDGWICK, DETERT, MORAN & ARNOLD

By: Dennis E. Raglin
DENNIS E. RAGLIN
SEDGWICK, DETERT, MORAN & ARNOLD
Attorneys for Defendant
DAIMLER CHRYSLER CORPORATION

DATED: July 18, 2006

WALKUP, MELODIA, KELLY, WECHT & SCHOENBERGER

By: Douglas S. Saeltzer
DOUGLAS S. SAELTZER
WALKUP, MELODIA, KELLY, WECHT &
SCHOENBERGER
Attorneys for Plaintiffs CARLA CORTES, a
minor, by and through her Guardian at Litem,
ISABEL CORTES GARCIA; ISABEL CORTES

1 GARCIA; and JUAN CARLOS GARCIA
2 TORRES

3 I, Douglas S. Saeltzer, am the ECF User whose ID and password are being used to file this
4 Stipulation and [Proposed] Order Re Continuation of Non-Expert Discovery Deadline. In
5 compliance with General Order 45, X(B), I hereby attest that Dennis Raglin has concurred in this
6 filing.

7 By:Douglas S. Saeltzer
8 DOUGLAS S. SAELTZER

9 [PROPOSED ORDER ON FOLLOWING PAGE]

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

PROPOSED ORDER

Pursuant to the Stipulation above, the deadline for non-expert discovery in the above-captioned matter is hereby continued to September 30, 2006.

IT IS SO ORDERED.

DATED: July 20, 2006

